

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

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In Re:	:	Case No. 06-12961-JKF
MICHAEL RALPH REAGOSO	:	
a/k/a MICHAEL R. REAGOSO	:	Chapter 7
a/k/a M. R. REAGOSO	:	
Debtor	:	
CAROL LYMAN REAGOSO	:	
a/k/a CAROL REAGOSO	:	
a/k/a CAROL L. REAGOSO	:	
Joint Debtor	:	
	:	
MICHAEL H. KALINER, TRUSTEE	:	Adv. No. 07-47
Plaintiff	:	
	:	
v.	:	
MORTGAGE ELECTRONIC	:	
REGISTRATION SYSTEMS, INC.	:	
and	:	
LITTON LOAN SERVICE, LP	:	
a/k/a LITTON LOAN SERVICING, INC.	:	
and	:	
HOMEOWNERS LOAN CORP.	:	
Defendants.	:	

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**DEFENDANTS MORTGAGE ELECTRONIC REGISTRATION SYSTEMS, INC. AND
LITTON LOAN SERVICE, LP A/K/A LITTON LOAN SERVICING, INC.'S
MOTION TO DISMISS THE COMPLAINT PURSUANT TO RULES 12(b)(1) AND
12(b)(6) OF THE FEDERAL RULES OF CIVIL PROCEDURE**

Defendants Mortgage Electronic Registration Systems, Inc. ("MERS") as nominee for J.P. Morgan Chase Bank, Trustee and Litton Loan Servicing, Inc. (incorrectly designated in the Complaint as Litton Loan Service, LP) ("Litton"), hereby move this Court for an Order

dismissing the Complaint of Plaintiffs Michael Ralph Reagoso and Carol Lyman Reagoso pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure. In further support of this Motion, Defendants incorporate by reference the annexed Memorandum of Law.

WILENTZ GOLDMAN & SPITZER, P.A.

Date: April 17, 2007

BY: /s/ Jonathan J. Bart

Jonathan J. Bart, Esquire
Attorney for Defendants,
Mortgage Electronic Registration
Systems, Inc. and
Litton Loan Service, LP a/k/a
Litton Loan Servicing, Inc.

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